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VIA E-FILING

December 2, 2023

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Sanchez v. EZ Parking, et al., 23 cv 4052

Dear Judge Scanlon:

I represent Plaintiff in the above-referenced matter. I write on behalf of all parties except for Defendant EZ Parking (which is in default and understood to be defunct) in response to the Court's November 21, 2023 Order. Counsel to the parties (who apologize for our late submission of this letter) wish to propose the following discovery schedule for the Court's consideration:

1. The parties will serve document requests and interrogatories by December 31, 2023;
2. Responses to document requests and interrogatories will be served by January 31, 2024;
3. The deposition of Plaintiff will be completed by February 28, 2024;
4. The depositions of representatives of Defendant will be completed by March 29, 2024;
5. The depositions of non-party witnesses will be completed by April 12, 2024;
6. All discovery will be completed by April 30, 2024.

Respectfully submitted,

/s/

Vincent E. Bauer